UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: PAMELA JO CALHOUN, : CHAPTER 13

AKA PAM J. CALHOUN, AKA

PAMELA J. CALHOUN,

Debtor

:

JACK N. ZAHAROPOULOS,

STANDING CHAPTER 13 TRUSTEE,

Movant

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VS.

:

PAMELA JO CALHOUN, AKA PAM J. CALHOUN, AKA

PAMELA J. CALHOUN,

Respondent : CASE NO. 1-21-bk-02637-HWV

TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 14th day of January 14, 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, who objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

- 1. The Trustee avers that the Debtor's Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid -100% Plan. The Plan must pay at least \$26,560.82 to be properly funded based on claims filed as of January 13, 2025.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert the Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

BY: /s/Douglas R. Roeder, Esquire

Attorney for Trustee

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CERTIFICATE OF SERVICE

AND NOW, this 14th day of January, 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Gary J. Imblum, Esquire Imblum Law Offices, P.C. 4615 Derry Street Harrisburg, PA 17111

/s/Derek M. Strouphauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee